

# Forum Guide to

# STATE EDUCATION AGENCY SUPPORT FOR LOCAL EDUCATION AGENCIES IN CIVIL RIGHTS DATA REPORTING



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## National Cooperative Education Statistics System

The National Center for Education Statistics (NCES) established the National Cooperative Education Statistics System (Cooperative System) to assist in producing and maintaining comparable and uniform information and data on early childhood, elementary, and secondary education. These data are intended to be useful for policymaking at the federal, state, and local levels.

The National Forum on Education Statistics (Forum) is an entity of the Cooperative System and, among its other activities, proposes principles of good practice to assist state and local education agencies (SEAs and LEAs) in meeting this purpose. The Cooperative System and the Forum are supported in these endeavors by resources from NCES.

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This publication and other publications of the Forum may be found at the websites listed below.

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## Foreword

The purpose of this document is to serve as a supplemental resource to the *Forum Guide to Reporting Civil Rights Data* ([https://nces.ed.gov/forum/pub\\_2017168.asp](https://nces.ed.gov/forum/pub_2017168.asp)) by recommending best practices for SEAs that support their LEAs' reporting of civil rights data to ED.

## Intended Audience

This document is intended for staff in SEAs and LEAs whose responsibilities include any aspect of collecting, reporting, or analyzing their agency's Civil Rights Data Collection (CRDC) data.

## Organization of this Supplemental Document

- **Section One** provides a short introduction to the CRDC reporting responsibilities.
- **Section Two** discusses why and how SEAs could support CRDC reporting from LEAs.
- **Section Three** presents additional ways for SEAs to support their LEAs in their CRDC reporting.
- **Section Four** features case studies from SEAs that currently support their LEAs.

## National Forum on Education Statistics

The work of the Forum is a key aspect of the Cooperative System. The Cooperative System was established to produce and maintain, with the cooperation of the states, comparable and uniform education information and data that are useful for policymaking at the federal, state, and local levels. To assist in meeting this goal, NCES within IES—a part of ED—established the Forum to improve the collection, reporting, and use of elementary and secondary education statistics. The Forum includes approximately 120 representatives from SEAs, LEAs, the federal government, and other organizations with an interest in education data. The Forum deals with issues in education data policy, sponsors innovations in data collection and reporting, and provides technical assistance to improve state and local data systems.

## Development of Forum Products

Members of the Forum establish working groups to develop guides in data-related areas of interest to federal, state, and local education agencies. They are assisted in this work by NCES, but the content comes from the collective experience of working group members who review all products iteratively throughout the development process. After the working group completes the content and reviews the document a final time, the publications are subject to examination by members of the Forum standing committee that sponsors the project. Finally, Forum members review and formally vote to approve all documents before publication. NCES provides final review and approval before online publication. The information and opinions published in Forum products do not necessarily represent the policies or views of ED, IES, or NCES. Readers may modify, customize, or reproduce any or all parts of this document.

## Working Group Members

This online publication was developed through the Cooperative System and funded by NCES within IES—a part of ED. The Forum CRDC Reporting Focused Working Group is responsible for the content.

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## Acknowledgments

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## Section One:

# Introduction to the Civil Rights Data Collection (CRDC)

The CRDC, formerly known as the Elementary and Secondary School Civil Rights Survey, is an important part of the U.S. Department of Education's (ED's) Office for Civil Rights (OCR) strategy for administering and enforcing civil rights laws in U.S. public school districts and schools, including Puerto Rico. The CRDC collects a variety of information including student enrollment (preschool to grade 12); student access to rigorous courses, programs, resources, instructional and other school staff; and school climate factors such as student discipline and harassment and bullying. Much of the data is disaggregated by race/ethnicity, sex, disability, and whether students are English learners. OCR relies on CRDC data to investigate complaints alleging discrimination, determine whether civil rights laws have been violated, initiate proactive compliance reviews, and provide policy guidance and technical assistance to education institutions, parents, students, and communities.

For more information about the Civil Rights Data Collection (CRDC) from the U.S. Department of Education's (ED's) Office for Civil Rights (OCR):

- OCR (<https://www.ed.gov/ocr>)
- Civil Rights Data (<https://ocrdata.ed.gov>)
- CRDC Communities of Practice (<https://crdc.communities.ed.gov>)
- CRDC Resources (<https://www2.ed.gov/about/offices/list/ocr/data.html>)

## CRDC Collection and Reporting

The CRDC is ED's largest mandatory administrative collection of data directly from local education agencies (LEAs); however, state education agencies (SEAs) may report some or all CRDC data on behalf of LEAs to reduce reporting burden, improve data quality, or maximize the utility of relevant LEA data that already have been collected in state data systems. The CRDC is approved by the U.S. Office of Management and Budget (OMB) through a public review process, which evaluates and approves any proposed changes to the CRDC for each collection cycle.

Administratively, the chief administrative officer in each LEA (a school district superintendent, for instance) is responsible for formally assigning CRDC points of contact. These individuals, including a primary and alternate point of contact, are authorized to certify the agency's CRDC data submission to OCR. Depending on the size of the agency, multiple points of contact may be designated. For example, some LEAs may have a point of contact assigned for each school, depending on size, organization, administrative, and data management needs.

The CRDC online submission system includes data quality checks that detect potential errors and inconsistencies automatically as the data are entered. After the LEA completes data submission, including addressing any data quality checks and ensuring that the data are correct, the LEA superintendent is required to certify that the submitted CRDC data are correct to finalize the submission process.

## Section Two:

# Best Practices

### State Education Agency (SEA) Benefits

SEAs can provide support for local education agencies (LEAs) reporting Civil Rights Data Collection (CRDC) data in a number of ways, many of which also benefit SEAs:

- **Foster SEA data partnerships with LEAs:** The clearest benefit of SEAs reporting the CRDC is the reduction in LEA reporting burden. Many LEAs face limited staff capacity to respond to multiple data collections. Smaller LEAs in particular may lack both staff time and expertise (for example, they may be unable to hire or train staff who possess the appropriate data collection or analytical skills). SEAs currently reporting CRDC data for their LEAs note that providing LEAs with this type of technical support often is viewed as a core function of SEA responsibilities. Such support helps create more cooperative partnerships between SEAs and LEAs, which improves data quality as well as a host of other education functions across agencies.
- **Maximize the benefits of state data systems:** It is a best practice to collect each data element once and then use it multiple times. Thus, if a state data system already collected data from LEAs that also are necessary for CRDC reporting, it makes sense to report those data from the state system rather than expect LEAs to respond to another collection mandate. In addition, reporting previously collected data also demonstrates that the data the SEA collects are useful, showing why LEAs have been asked to report those data to the state in the first place.
- **Improve the quality of CRDC data:** Reporting CRDC data from a single state data system rather than separate LEA data systems increases data accuracy, comparability, and consistency, given that the state data system already will have performed quality checks on initial submissions and transformed the data into comparable formats. SEAs with a statewide student information system (SIS) have standards in place to provide direction on how data are stored, extracted, and reported, including ensuring that the data align with other use cases, such as federal (as in *EDFacts*) and statewide reporting.
- **Align state collections and reporting:** SEAs that report CRDC data from state data systems will find it easier to align CRDC reporting with other federally mandated data reporting, such as *EDFacts*.

### SEA Priorities for Successful Support

SEAs in several states already report some or all CRDC data on behalf of their LEAs. Some priorities for successfully supporting LEAs in this manner include the following:

- **Assign appropriate staff resources:** To adequately support LEAs, the SEA needs to commit time from its own staff to undertake the CRDC reporting effort. These staff must possess expertise in the state data system, understand the mechanics of LEA reporting to the state, know CRDC reporting requirements, and have skills in programming, data analysis, and federal data reporting.

- **Identify which data the SEA can provide:** SEAs should determine which CRDC-required data are already included in the SEA data system. This requires mapping data from the state system to the CRDC report, which is a critical step in any data reporting effort. Some data elements can be conveyed without modification, but other elements may require reformatting to match CRDC definitions; to give an example, multiple elements may need to be disaggregated to reflect a CRDC data request. Any changes to the CRDC between collections will require additional mapping to confirm that the SEA data system can accommodate the new request.
- **Prepare the first set of files:** After understanding which data elements can be reported, the SEA can create processes for moving data from the state data system into a format for CRDC reporting. This task requires SEA staff programming time and expertise to create and test the files. Once files have been created for the first time, the level of effort from the SEA should decrease as only changes made to the CRDC or the SEA system will need to be updated for future CRDC reporting.
- **Provide data quality review:** Data quality reviews can be accomplished in a variety of ways. For those CRDC items collected by a state data system and used by the SEA for another purpose, data quality is generally addressed as a standard procedure at the point of data entry into the state system. These reviews are generally undertaken by state program staff who are responsible for the collection and management of those data. Any data collected for only CRDC purposes would need an appropriate data quality review upon entry (by qualified staff) in the same manner as any other data that are entered into the state data system. Involving LEAs in the process of setting up any new data quality reviews for the CRDC provides important insight from the LEA into the data and generates LEA buy-in on the review implementation.
- **Upload files to the CRDC reporting system:** Even after data quality is confirmed at the point of entry, whenever data files are compiled for subsequent management or reporting purposes, it is appropriate to implement additional data quality checks to ensure that compiling, transforming, and reformatting does not introduce new quality concerns. For example, when an SEA uploads CRDC files for its LEAs into the CRDC reporting system, the SEA should inform each LEA that the submission is ready for their authorized points of contact to confirm that the data are correct, which would include providing any missing data, addressing any data errors flagged by CRDC data quality checks and, eventually, formally certifying the data submission as complete.
- **Provide technical assistance:** SEAs also can serve a technical assistance function for LEAs, providing first-level support for data questions, acting as a conduit for communications with the U.S. Department of Education's (ED's) Office for Civil Rights (OCR) or other LEAs, and sharing tips and lessons learned about the CRDC collection process. As a function of normal state reporting, most LEAs already have a relationship with SEA data experts and there is a level of familiarity, comfort, and trust that can facilitate communication and ease burden in the final stages of CRDC reporting.
- **Monitor LEA progress:** SEAs can use the CRDC reporting system to monitor LEA progress once the SEA has turned over the reporting to the LEAs. When appropriate, SEAs can offer to assist LEAs that are not progressing toward completion. SEAs also can celebrate those LEAs that have certified their CRDC reporting.

## SEA Challenges

As with any data reporting responsibility, there can be challenges to SEAs when reporting data for LEAs:

- **Lack of defined SEA role:** ED establishes the mandatory reporting role for LEAs in CRDC reporting but does not assign an official role to SEAs. In SEAs with limited resources, addressing required duties could reasonably take higher priority than assuming additional responsibilities that are beneficial but not essential for LEA support. Given this lack of a defined role, SEAs should determine, or perhaps even negotiate, how best to help without direct authorization.

- **SEA capacity:** An SEA’s level of effort will vary depending on the amount of CRDC data residing in the state data system, the format in which these data are accessible relative to CRDC requirements, and the level of engagement the SEA decides to provide. SEA support also requires experienced staff with time that aligns with the CRDC’s collection and submission schedule. Importantly, once SEA support begins it may be challenging to disengage if LEAs have learned to depend on it (for example, if an LEA reassigns staff because it assumes the SEA is handling reporting responsibilities).
- **CRDC data in state data systems:** SEAs only submit the data they already have in their state data systems. If an SEA does not already collect the majority of the CRDC data needed for other state or federal purposes, then they cannot report the majority of the required CRDC data for their LEAs. Further, if an SEA only submits a small percentage of LEA data to CRDC, then even with SEA support, entering the rest of the data may represent a significant effort for the LEA. In such a scenario, it may be less of a burden for the LEA to generate and submit its own data file rather than search for and remediate gaps in a sparse SEA submission. Many SEAs cannot add new requirements to statewide data collections unless they are mandated by federal or state law. In addition, most SEAs must go through a rigorous public review process to add data items to their collections.
- **Monitor and adapt to reporting requirement changes:** OCR revises the CRDC reporting requirements in each collection cycle that is approved through the U.S. Office of Management and Budget (OMB) information collection package process. SEAs can review the proposed CRDC changes, provide public comments, and gain an understanding of the impact on their LEA support. Once the package is approved, the SEA would review the changes based on their existing reporting support to determine whether any changes are needed.

## SEAs Reporting for LEAs

SEAs that already report CRDC data for LEAs have identified several best practices and lessons learned that help provide effective, efficient, and timely support:

- **Take direction from the LEAs:** SEAs should ask the LEAs what type of support they would like to receive to determine ways to support LEAs in their efforts to submit CRDC data. For example, some SEAs have learned that LEAs do not want an SEA to add CRDC elements not already available in existing state collections just so the SEA could report them on an LEA’s behalf. In such a circumstance, LEAs would prefer to submit that portion of the data to the CRDC themselves rather than add it to their state reporting simply so the SEA could forward the responses. There might be little incentive to build a new support system with more assistance than is wanted or needed by their LEAs because of SEAs’ limited resources.
- **Create an opt-out process:** Some LEAs, particularly large LEAs, already could have a data team and data management processes in place to report the CRDC. In these cases, an SEA reporting some of the CRDC on an LEA’s behalf may complicate the LEA’s submission. SEAs can provide an easy and transparent mechanism for LEAs to opt out of SEA support when that meets LEA needs.
- **Name SEA support staff:** If an SEA is going to assume responsibilities to report any part of an LEA’s CRDC data, the LEA needs to know which person or team is undertaking the work on their behalf. LEAs are likely to have insights, context, related data, and even corrections to share and should, therefore, have contact information for directly communicating with appropriate SEA staff.
- **Provide technical assistance through completion:** Even after the SEA has reported CRDC data for LEAs, the LEAs still are responsible for reporting any remaining data, reviewing data quality edits from the CRDC reporting system, and certifying the submission. For some LEAs, particularly smaller agencies that may



not have data teams, staff may not have a lot of experience carrying out these final responsibilities in a federal collection like the CRDC. SEA staff should expect to provide technical reporting assistance to LEAs until the submission is approved and finalized.

- **Start small:** SEAs need not approach reporting CRDC data for LEAs as an all-or-nothing matter. It may make sense to begin with a pilot program, such as offering to report a subset of data items, offering help to a trial selection of LEAs, or offering specific assistance priorities. This will allow the SEA to assess whether the proposed support process works for both the SEA and LEA. Once a foundation is established and any unexpected shortcomings have been corrected, a more comprehensive support effort can be instituted.

## Section Three:

# Other Ways to Support Local Education Agencies (LEAs)

There are other ways state education agencies (SEAs) can support LEAs in their Civil Rights Data Collection (CRDC) reporting. The recommendations below, while not comprehensive, are a good start.

### Communications and Outreach

SEAs can provide communication and outreach support to LEAs engaged in reporting CRDC data. SEAs tend to have more experience with federal data collections and likely have a good deal of expertise within the agency that could help LEA staff who have less experience following federal data reporting protocols. Consider the following:

- **Engage with the U.S. Department of Education’s (ED’s) Office for Civil Rights (OCR)**  
**resources:** OCR has created a CRDC Communities of Practice website (<https://crdc.communities.ed.gov>) to facilitate communications with LEAs. SEAs can create state groups on this website to establish a space open only to its LEAs, where they can talk about their specific CRDC needs. Some SEAs already have used this resource to share CRDC feedback and responses to questions with all the LEAs in their state. SEAs also can create or use their own agencies’ websites to communicate with their LEAs about the CRDC.
- **Provide basic informational support to their LEAs:** LEAs are accustomed to receiving SEA communications by way of familiar tools and timing such as monthly e-newsletters or regular data meetings. SEAs can add information about where to find information on OCR and the CRDC, links to the CRDC Partner Support Center (PSC) and the user community website from OCR, and other information the SEA develops to support its LEAs.
- **Proactively contact LEA staff:** SEAs may reach out directly to LEA staff tasked with CRDC reporting requirements if the SEA is aware of individual names and contact information. The SEA may offer sign-up or opt-in notifications in routine SEA correspondence so that LEA staff may choose to share their contact information for SEA contact and support. When this information is available, communication is more likely to happen both ways. SEAs should consider web meetings for communication, when possible, instead of lengthy written emails.
- **Represent needs to vendors:** SEAs can assist LEAs by providing important outreach resources to the vendor community. For example, SEAs can advocate on behalf of LEAs for student information system (SIS) vendors to improve CRDC reporting tools. Even SEAs that do not have statewide SISs can use these types of vendor groups to raise common CRDC issues and needs.

### Technical Assistance/Training

SEAs can provide a wide range of technical assistance to LEAs responding to CRDC reporting requirements. This may include helping LEAs interpret the CRDC data request, develop crosswalks of CRDC and state data (which the LEA should be familiar with because of its state reporting duties), use the state data system for data verification and validation, and conduct contextual data quality runs from the state data system. SEAs also can provide first-tier support for CRDC



questions by trying to answer an LEA's question before referring questions to the CRDC PSC, which is charged with providing answers to CRDC respondent inquiries. Once questions have been satisfied, the SEA could share all questions and answers for other LEAs in the state to view.

Most SEAs have existing systems for training their LEAs in state data system processes. LEAs typically know how to use these systems and are comfortable with how to find information within them. SEAs can take advantage of this existing familiarity by adding CRDC-related training for their LEA partners. SEAs can also host webinars or other outreach programs designed to improve LEA expertise in the CRDC.

Similarly, SEAs can modify CRDC documentation and provide state-customized CRDC training materials to their LEAs. These types of resources can be incorporated into statewide newsletters, articles, and memos that already are read by administrative, data, program, and information technology (IT) staff across a state's education system.

## Section Four:

# Case Studies

Section Four features case studies from state education agencies (SEAs) about their support of local education agencies (LEAs) in Civil Rights Data Collection (CRDC) reporting, including the benefits gained, challenges experienced, and lessons learned.

### Case Study #1. Virginia Department of Education (VDOE)

VDOE has been reporting the CRDC for more than 130 Virginia LEAs since the 2017–18 school year. Today the SEA reports approximately 45 percent of the CRDC data elements for its LEAs. On average, 20 LEAs opt out of the SEA reporting and complete the CRDC reporting themselves. Seven different student information system (SIS) vendors support Virginia's LEAs.

#### Virginia's Support

In 2017, VDOE formed a focus group of LEA data managers to learn how the SEA could support its LEAs with their CRDC reporting responsibilities. The workgroup determined that the LEAs did not want VDOE to collect all the CRDC items for the sole purpose of the SEA reporting them to the CRDC. The LEAs did not need the SEA to be a conduit to CRDC reporting but preferred the SEA to report any required CRDC data that the SEA already had. The level of support provided from VDOE to LEAs has increased each year with the addition of new CRDC data elements and reporting requirements. Major support includes the following:

- **Determine which data elements the SEA can provide:** The 2017 workgroup reviewed data elements and determined which data already were reported to the SEA and could be uploaded by the SEA on behalf of the LEAs. The focus group met weekly for several months to discuss each data element. The CRDC data elements were compared with the data collected in the annual VDOE reporting. The group found that a little less than half of the CRDC data elements could be matched with data VDOE was already collecting through three main SEA-level collections.
- **Provide SEA-level support staff:** To support the CRDC reporting of its LEAs, VDOE provides multiple staff, including
  - **Information Technology (IT) Specialist II:** Runs the file development programming, reviews output, and compiles the data files for LEAs; and
  - **Education Data Specialist:** Uploads the data files that were created by the IT Specialist. The Education Data Specialist also provides support to the LEAs when there are questions or if the LEA is facing challenges. Support includes answering general questions, researching a problem with data elements, or helping LEAs fix errors they received during the submission process.
- **Initial programming:** In the first year, staff time and resources were needed to write a programming procedure for reporting CRDC data. The procedure to run all the data at one time included more than 3,000 lines of code. Once that was completed, running the data for the LEAs was streamlined and now takes less time to compile for each CRDC collection.

- **Creating an opt-out process:** Each year, LEAs complete the Educational Registry Application (ERA) that collects LEA-level information such as superintendent designees and other information relating to the LEA. During this collection, LEAs may opt out of the SEA prepopulating CRDC data. The selections, which are stored in the statewide longitudinal data system (SLDS) database, are used to produce a list of LEAs requesting to have data prepopulated.
- **Upload files to the CRDC collection system:** VDOE follows the timeline established by the U.S. Department of Education’s (ED’s) Office for Civil Rights (OCR). LEAs receive notification several months before the submission system opens to share resources, updates, and the CRDC timeline. In the first week of the CRDC system being opened, VDOE prepopulates the data elements for its LEAs. The reporting process does not include LEA review of the files before submission because the SEA already vetted the data thoroughly through its data quality processes.
- **Continue to monitor LEAs’ progress:** The Education Data Specialist who serves as the CRDC liaison monitors the CRDC weekly reports that show the progress each LEA makes during the submission phase of the collection. LEAs showing minimal progress are contacted and offered help with reporting or working through any system-related issues. Closer to the end of the collection, LEA progress is checked daily. LEAs at risk of not completing their submission by the end of the collection window are contacted via email or phone call to confirm they are working toward completing the certification process. The weekly *Tuesday Telegram* that is sent to all LEAs recognizes LEAs that are 100 percent certified by the CRDC system.
- **Communications/ Customer Support:** Different forms of communication and support from the SEA to the LEAs are used throughout the CRDC reporting process.
  - o **Daily Support:** The Education Data Specialist provides daily support to LEAs during the collection process. This includes answering questions, researching answers, providing other resources that LEAs find helpful, and coordinating questions for OCR.
  - o **Weekly Data Newsletter:** The *Tuesday Telegram* is a weekly newsletter containing updates and resources LEAs need for all their VDOE reporting. The newsletter has a dedicated space to communicate information about the CRDC.
  - o **Tips and Advice:** VDOE shares tips and other helpful information with LEAs throughout the year including the opening of the registration period, the comment period for Federal Register packages, and frequently asked questions (FAQs).

#### Benefits of the SEA

Supporting LEAs’ CRDC reporting is a major commitment by SEAs. VDOE has seen many benefits with this work, including the following:

- **Easing LEA burden:** VDOE collects data multiple times a year, and LEA data managers already devote extensive time to reporting. Virginia decided to prepopulate data elements for LEAs to alleviate the burden of reporting the same data multiple times. This way, the data already reported to the SEA can be collected once and used multiple times.
- **Enhanced data quality:** Ensuring accurate data and data quality is one benefit of VDOE prepopulating elements for the LEA. The data prepopulated for the LEAs already have been through the SEA’s data quality review process, and the LEA superintendents have signed off on the data. Therefore, the SEA ensures that it is submitting high-quality data to the CRDC system.
- **Partnership with LEAs:** Because VDOE requires so much from the LEAs, aiming to alleviate the federal reporting burden on LEAs frees up their time to focus on other state data reporting requirements. This also fosters a culture of data quality and cooperation.



## Lessons Learned/Best Practices

In the process of providing this support, VDOE has learned several lessons and developed some best practices:

- **Take direction from LEAs:** When VDOE formed the initial working group, the purpose was to listen to the LEAs, hear what challenges LEAs experienced with CRDC reporting, and what types of assistance LEAs wanted from the SEA. The LEAs appreciated having the opportunity to provide feedback and input on aspects such as prepopulated data elements and were clear that they wanted assistance that did not result in the LEAs reporting more data to the SEA. The CRDC is not an SEA collection, and the SEA works more as a “silent partner” to support the LEAs.
- **Opt-out process:** VDOE also recognizes and supports the LEAs that want to report all CRDC data themselves. Some LEAs have data procedures already in place and want to maintain ownership of that process. Because the CRDC is an LEA’s responsibility, VDOE provides an “opt-out” for reporting data on their behalf. Having the VDOE opt-out selection as part of the ERA helps identify the LEAs that choose to do their own CRDC reporting.
- **Support:** The support provided by the SEA is invaluable to LEAs. Many LEAs, particularly small LEAs, have staff turnovers or staff assigned to the CRDC with minimal federal reporting experience. It is important to have someone at the SEA who can help with federal reporting throughout the entire process.
- **Start small:** SEAs do not need to start providing all the support in the first year. Start by asking the LEAs what they need and take small, incremental steps toward meeting their needs at the level the SEA can provide.
- **SEA data team:** Having a strong data team has helped VDOE provide the type and quality of support needed for its LEAs. The team’s strength is in experience (such as the Education Data Specialist’s prior work as an LEA staff person who submitted the CRDC for their LEA), LEA relations, and participation in federal stakeholder communities.

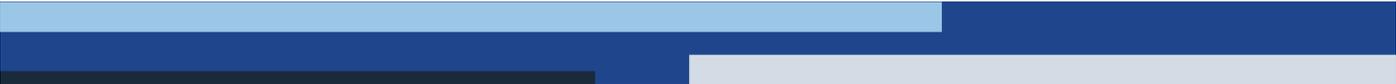
## Case Study #2. Colorado Department of Education (CDE)

CDE has been reporting the CRDC for more than 180 Colorado LEAs since the 2013–14 school year. Today the SEA reports approximately 85 to 90 percent of CRDC data elements for its LEAs. Each year two to four LEAs opt out of SEA CRDC reporting and complete the reporting themselves.

### Colorado's Support

CDE has spent years working out a system of supporting its LEAs in CRDC reporting. To prepare for this support the SEA developed a communication plan, organized pilot testing, and created programming needed for file development and data quality checks. This planning work included many conversations with OCR to understand reporting requirements. Major steps included the following:

- **Provide SEA-level support staff:** To support the CRDC reporting of its LEAs, CDE provides multiple staff, including
  - **CRDC SEA Coordinator:** organizes the collection and resources, submits the data files into the CRDC, runs reports, monitors LEA progress, ensures documentation is up to date, and runs meetings with internal stakeholders;
  - **SEA Communicator:** provides support to LEAs through various media;
  - **Data Collection Leads:** up to six people who identify data elements for the SEA to prepopulate, update logic for each data element, perform data validation, and post documents for LEAs; and
  - **Programmers:** up to three people who create data files, update logic, and perform quality assurance (QA) and testing on data files.
- **Determine which data elements the SEA can provide:** CDE does not collect all the items necessary for CRDC reporting. For each CRDC collection, CDE reviews any changes to the collection to determine and confirm which items it already collects and can report for its LEAs. Any data items needed for the CRDC must be part of a preexisting CDE collection.
- **Gather programming requirements:** After confirming the required items, CDE reviews the programming needs for CRDC data and any potential implications for the existing CRDC system's skip logic and business rules.
- **Perform data quality review:** After creating the CRDC data files, CDE runs data quality reviews and business rules edits on the data files. Several staff are involved in this process:
  - **Programmers:** run queries to review any items that are new or revised.
  - **CDE Program Staff:** validate the data for their collections and certify the data are complete and accurate.
  - **CRDC SEA Coordinator:** completes second-level checks for missing data or invalid counts.
- **Reconcile the directory:** CRDC reporting is based on a directory of LEAs and their schools. CDE reviews the CRDC Directory prior to the CRDC opening for differences from the EDFACTS directory universe and performs any needed reconciliation.
- **Upload files to the CRDC collection system:** With the prep work completed, CDE is ready to upload the files on the CRDC system's open date. CDE then informs its LEAs when the state submissions are complete.
- **Transfer data reporting responsibility to the LEAs:** After CDE has submitted the files, its LEAs are responsible for reporting the remaining data items and certifying their submission for OCR.
- **Continue to monitor LEAs' progress:** CDE's CRDC Coordinator runs weekly certification progress reports from the CRDC system to check the status of completion for each LEA. About four weeks before the CRDC due dates, CDE emails all uncertified LEAs reminding them of the deadline and encourages outreach



to the CRDC Partner Support Center (PSC) as needed. One week before closure, CDE follows up with more emails and phone calls.

- **Support communications with OCR:** During the reporting process, CDE encourages its LEAs to reach out to the PSC with questions and issues.
- **Communications with LEAs:** Supporting LEAs with CRDC reporting involves several types of communication between CDE and its LEAs:
  - **Support website:** CDE provides a website that includes important dates, a list of CDE-provided data elements, CDE contact information, and other relevant information (<http://www.cde.state.co.us/datapipeline/crdc-cde-data-provision>).
  - **Weekly Town Halls:** CDE has weekly data collection town halls with its LEAs that include CRDC reporting.
  - **Emails:** CDE sends emails and letters to each LEA's CRDC respondent and superintendent regarding the upcoming collections, what CDE will be providing, what the LEAs need to do, and more.
- **Reporting documentation:** CDE provides information on elements it submits and details around those elements such as skip logic, filters, changes in programming, and more.

#### Benefits of the SEA

Supporting LEAs' CRDC reporting is a major commitment by SEAs. CDE has seen many benefits with this work:

- **Easing LEA burden:** CRDC reporting is a substantial time commitment for an LEA. By prepopulating a high percentage of the data elements already collected at the state level, CDE has been able to reduce this reporting burden, in both time and resources, for its LEAs.
- **Enhanced data quality:** Since most of the data needed for the CRDC are already collected by CDE and run through state-level data checks and certification, they are of higher quality than data that would be reported individually by LEAs.
- **Improved timeliness of data reporting:** Having CDE submit the majority of the data on the day the CRDC system opens allows CDE's LEAs to complete the collection in a timelier fashion.
- **Goodwill between CDE and LEAs:** The LEAs understand the level of effort by CDE and understand how much time it is saving them. This leads to better cooperation from LEAs on CRDC reporting and other data collections from CDE.

#### Lessons Learned/Best Practices

In the process of providing this support, CDE has learned several lessons and developed some best practices:

- **Pilot the support:** Recruit one or two districts to review the prepopulated data, report when files are uploaded into the CRDC, and discuss questions and feedback the LEAs have on the process.
- **Decide who should be involved:** This type of project requires a thorough understanding of the SEA's data and systems. CDE had to determine SEA-level support staff and their degree of involvement, such as capacity, knowledge of CRDC requirements, and the SEA's system architecture. CDE staff knew this effort would require significant time from subject matter experts (SMEs), business analysts, programmers, and CRDC experts, so they looked for opportunities to set priorities, coordinate activities, and involve the right people at the right time.

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- **Start before the CRDC system opens:** This is an intensive, time-consuming process that cannot be started close to the reporting deadline. CDE starts planning months in advance, as soon as the CRDC documents become available. The planning process includes the following steps:
    - Engage early with the CRDC PSC, and throughout the process.
    - Develop CDE's internal communication plan.
    - Review CDE's source data and their relation to CRDC reporting.
    - Decide which CDE collection elements match the CRDC elements. CDE carefully considers data element changes, definitions, instructions, skip logic, and data submission schedules when supporting the LEAs.
  - **Monitor LEAs during the open system:** Supporting LEAs requires regular communication from CDE to its LEAs, from start to finish. CDE helps LEAs troubleshoot why errors or warnings are being triggered. CDE has found that monitoring and reminding LEAs who have not certified their data toward the end of the reporting period has increased the number of LEAs that certify on time.
  - **Continual improvements:** CDE regularly holds pre- and post-collection discussions with LEAs to get input on what went well and what can be improved. CDE also participates in the CRDC SEA Engagement Group to receive monthly updates from OCR and engage in discussions with other SEAs on best practices.

### Case Study #3. Kentucky Department of Education (KDE)

KDE has been reporting the CRDC for more than 170 Kentucky LEAs since the 2015–16 school year. Today KDE reports approximately 98 percent of the CRDC data elements for its LEAs.

#### Kentucky's Support

KDE promotes the CRDC and reports data already available in existing KDE data systems. Major assistance provided to LEAs includes the following:

- **Provide SEA support staff:** KDE has one primary point of contact and several other staff members responsible for developing specifications, creating extracts, and verifying data quality before submission. Preparing the LEA data files involves a programmer and two data analysts mapping the data requirements, extracting the data, and verifying the quality of the data, at an estimate of one-half of a full-time employee (FTE) for about three months. Once the CRDC opens and KDE submits the files for the LEAs, one FTE staff person helps districts. In total, KDE estimates this as one FTE, annualized for CRDC collections, depending on the number of changes to the CRDC collection.
- **Determine which data elements the SEA can provide:** KDE reviews the CRDC data elements and specifications to align with current KDE collections. KDE publishes a reporting matrix that maps KDE to CRDC data elements and communicates with districts to encourage support for and confidence in SEA reporting. All LEAs in Kentucky use a statewide SIS. The few CRDC items not collected in the SIS are not reported by KDE, because KDE did not want to add items into existing collections just for the CRDC.
- **Perform data quality review:** Each year before submitting the CRDC files, KDE reviews CRDC specifications and file extracts to verify quality and any new data quality review needed for changes in the CRDC data elements. Because Kentucky has a statewide SIS, KDE has access to LEA data without waiting on a collection period. KDE creates reports to help LEAs match student detail to aggregated numbers, and each has detailed and aggregate reports that helps with validation. LEAs validate data for School Report Card reporting and any time after validation in early October, KDE has confidence in the quality of the data.
- **Upload files to the CRDC collection system:** KDE compiles and submits LEA data each year, asking LEAs to wait and allow the SEA to load the files before the LEAs enter the system to upload additional data or make any needed changes. At any time, the LEA has the option to reload their data to replace what KDE loaded. No LEA completely opts out of KDE submitting the CRDC files.
- **Continue to monitor LEAs' progress:** KDE reviews the weekly certification progress reports from the CRDC system to check the status of completion for each LEA. KDE follows up with LEAs via email and phone until all are certified.
- **Communications with LEAs:** KDE communicates in many ways with its LEAs during CRDC reporting.
  - **KDE CRDC Website:** This website includes the complete CRDC timeline, the CRDC reporting matrix, as well as many resources for LEAs, including direct links to resources from OCR, such as FAQs, checklists, presentations, and more (<https://education.ky.gov/districts/tech/sis/Pages/KY-CRDC.aspx>).
  - **Training:** KDE provides training to ensure that LEAs are aware of the timeline and any changes from prior collections. Training is offered at the annual statewide SIS conference; web meetings also have been used for statewide trainings and one-on-one assistance is available on request.
  - **Email:** Regular email communications keep LEAs' CRDC contacts current on information from KDE and OCR.
  - **Phone:** Team calls to follow-up with LEAs as needed.

## Benefits of the SEA

Supporting LEAs' CRDC reporting is a major commitment by SEAs. Benefits of this work include the following:

- **Easing LEA burden:** CRDC reporting is a substantial time commitment for an LEA, but KDE wants to assist its LEAs as much as possible. By prepopulating a high percentage of the data elements already collected at the state level, KDE has reduced this reporting burden, in both time and resources, for its LEAs. The LEAs understand the level of effort by KDE and how much time it saves them.
- **Get the most out of the statewide SIS:** Collecting items once and using them multiple times promotes the value of the statewide SIS and all the data collected. The LEAs can directly see the reduction in burden by having the state use the data already accessible in the SIS for the CRDC.
- **Enhanced data quality:** Having KDE report these data from the existing SIS promotes statewide consistency in reporting. These data have passed KDE's data quality checks, and all the LEAs in the state report the same way. Also, if an LEA notifies KDE of an issue in the CRDC reporting system, KDE can research and correct, pull and resubmit, or correct the data for all LEAs at one time.

## Lessons Learned/Best Practices

In the process of providing this support, KDE has learned several lessons and developed some best practices, including the following:

- **Website:** Create a state-specific webpage, which is easy to do and helpful for LEAs. Providing a website with all the needed resources for LEAs also reduces phone calls to the SEA.
- **Data Quality:** Create data quality tools so the LEAs can see how KDE calculates the counts reported on their behalf. Aligning data tools that LEAs can use for the CRDC is important because it allows LEAs to verify data that the SEA pulls before validation takes place.
- **Data Element Matrix:** Create a spreadsheet so that the LEAs will know which elements KDE is submitting on their behalf and which elements they will be required to load themselves. This also allows the LEAs to see the connection between the statewide SIS elements and how they are used for this federal reporting requirement. KDE does not use all the data for another purpose, but the data are collected in the SIS by districts.
- **Support new LEA staff:** LEA staff turnover can be an issue with more than 170 LEAs. KDE works with new LEA staff to help them understand what is needed from LEAs for this federal reporting requirement. This support includes helping the new staff member get access to the CRDC system, showing them the different sources of information, and keeping them updated on changes and timelines.

## Case Study #4. North Carolina Department of Public Instruction (NCDPI)

NCDPI has been reporting the CRDC for more than 300 North Carolina LEAs since the 2013–14 school year. Today the SEA reports approximately 99 percent of the CRDC data elements for its LEAs. North Carolina has a statewide SIS.

### North Carolina's Support

NCDPI support evolves with each CRDC collection. Major support:

- **Provide SEA-level support staff:** No formal job description has been created for the SEA role, though there is a staff member identified as the SEA CRDC Coordinator. The staff member's title is Business Analyst, and they hold the majority of the responsibility for assisting the LEAs with the collection. In future CRDC collections there will be another NCDPI business analyst role that will provide support as well.
- **Determine which data elements the SEA can provide:** Originally NCDPI reviewed existing data elements in the statewide SIS against what are collected in the CRDC and completed an analysis of gaps. The state collects approximately 99 percent of the data required for the CRDC. Outliers include LEAs that have not provided data to the authoritative state systems. NCDPI does not collect any data that are not already reported to NCDPI for federal and state requirements.
- **LEA preview period:** NCDPI provides a preview period for LEAs prior to the CRDC submission window opening. The preview period allows LEAs to review their data so the LEAs can make updates and corrections as needed once the CRDC submission window opens.
- **Upload files to the CRDC collection system:** NCDPI uploads the LEA data once the submission tool opens and then communicates to the LEAs that the data have been submitted and the LEAs can begin their review, update, and certification process.
- **Provide data quality checks:** NCDPI's data quality efforts improve with each collection. NCDPI provides QA checks, student-level detail views for each LEA, guidance to LEAs on how to validate the data, error reporting, and communication of global data issues to all LEAs. NCDPI also advises on reports to pull before the end-of-year reporting processes occur.
- **Continue to monitor LEAs' progress:** Before and up until the day the submission closes, NCDPI communicates with all LEAs. NCDPI sends the CRDC state-level certification report to all LEAs so they are aware of their status in completing the collection. LEAs who do not respond are contacted individually to complete the collection.
- **Communications with LEAs:** NCDPI communicates with LEAs in several ways. NCDPI uses a formal email list for all LEA staff identified as CRDC and SIS coordinators. NCDPI CRDC emails also are sent through SIS distribution lists, Office of Charter Schools, and any relevant email lists based on the audience and need. NCDPI also implemented a North Carolina CRDC community-of-practice workgroup in the CRDC PSC that allows the LEAs to directly communicate with one another and NCDPI on issues, best practices, resource sharing, and networking. This workgroup ensures that all LEAs are given the same information at the same time. Other communications include reminders to update contact information for the state and announce the release of CRDC packages from the U.S. Office of Management and Budget (OMB).
- **Technical assistance for LEAs:** NCDPI provides several types of technical assistance for LEAs including user documentation, webinars, and individual work sessions. Before the coronavirus disease (COVID-19) pandemic, NCDPI offered in-house labs for those who could travel to NCDPI. Other technical assistance support includes communication of timelines, requirements releases, submission dates, and requirements for preparing for the state-level extract of data, as well as trainings on how CRDC data are collected, compiled, and validated, on the CRDC submission tool, and on data quality.

## Benefits of the SEA

Supporting LEAs' CRDC reporting is a major commitment by SEAs. NCDPI has seen many benefits with this work:

- **Easing LEA burden:** CRDC reporting is a substantial time commitment for an LEA. By prepopulating a high percentage of the data elements already collected at the state level, NCDPI has been able to reduce this reporting burden, in both time and resources, for its LEAs.
- **Collect once and use many times:** The data needed for the CRDC already are reported to NCDPI for other reporting reasons and can be used multiple times, providing efficiency in federal and state reporting.
- **Enhanced data quality:** The data needed for the CRDC already are collected by NCDPI and run through state-level data checks and certification, which provides data consistency. NCDPI's creation of the community-of-practice workgroup, where all LEAs can see data quality questions and answers, has also improved the quality of reported data.

## Lessons Learned/Best Practices

In the process of providing this support, NCDPI has learned several lessons and developed some best practices:

- **Be ready at the start:** At the beginning, the SEA should be thorough and thoughtful as it positions itself to assist LEAs. Considerations for the first year might include garnering program area engagement, using a previous year's collection to test ETL (Extract, Transform, Load) processes, and possibly only committing to submitting a percentage of the first collection.
- **Use beta testing:** The first year NCDPI reported the CRDC for LEAs, the LEAs beta tested and reviewed each iteration of the reporting as it was developed. Almost 100% of LEAs engaged in this process, which allowed NCDPI to correct common global issues that would not be visible in a sample test environment.
- **Communication is critical:** Having an NCDPI contact who can answer LEA questions is vital to a successful collection. The CRDC community-of-practice workgroup created by NCDPI provided an important communication avenue, ensuring that all LEAs are given the same information at the same time. The communications process between NCDPI and the LEAs is always evolving. For example, the process began as a request for each LEA to send contact information to NCDPI and quickly has evolved into LEAs self-reporting contact information directly into an authoritative system as the role is reassigned at the LEA (<https://www.dpi.nc.gov/data-reports/data-reporting-and-program-monitoring/civil-rights-data-collection>).
- **Translate for LEAs:** Translating federal documentation into state-specific language is important to ensure that LEAs understand the data being used. Resources "translated" into state-specific language include user documentation, a data dictionary, and internal analysis guides.
- **Support collaboration:** When the SEA provides collaboration between state program offices, the CRDC SEA coordinator, and other SEA report developers, it can ensure consistent reporting throughout the state, regardless of the different reporting needs.